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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 12 2014

SEAN F. McAVOY, CLERK
YAKIMA, WASHINGTON DEPUTY

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,) 4:14-CR-6049-SMJ
12) INDICTMENT
13 Plaintiff,)
14 vs.) Ct. 1: 18 U.S.C. § 2422(b), Attempted
15) Enticement of a Minor
16)
17 DALE H. WEBER,) 18 U.S.C. § 2428
18) Forfeiture Allegations
19 Defendant.)
20)
21)
22)
23)
24)
25)
26)
27)
28)

The Grand Jury charges:

COUNT 1

On or about and between September 24, 2014, and October 21, 2014, in the Eastern District of Washington and elsewhere, the Defendant, DALE H. WEBER, did unlawfully and knowingly use any facility and means of interstate and foreign commerce, to wit: the internet and a cellular phone; to attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, including Revised Code of Washington 9A.44.076, rape of a child in the
INDICTMENT

1 second degree, and attempt to do so, all in violation of Title 18, United States
2 Code, Section 2422(b).

3
4 Notice of Criminal Forfeiture Allegations

5 1. The allegations contained in Count 1 of this Indictment are hereby
6 realleged and incorporated by reference for the purpose of alleging forfeitures
7 pursuant to Title 18, United States Code, Section 2428.

9 2. Pursuant to Title 18, United States Code, Section 2428, upon
10 conviction of an offense in violation of Title 18, United States Code, Section 2422,
11 the Defendant, DALE H. WEBER, shall forfeit to the United States of America
12 any property, real or personal, that was used or intended to be used to commit or to
13 facilitate the commission of the offense[s] and any property, real or personal,
14 constituting or derived from any proceeds obtained, directly or indirectly, as a
15 result of the offense[s]. The property to be forfeited includes, but is not limited to,
16 the following:
17
18
19

20 ELECTRONIC EQUIPMENT

- 21
22 1) AT&T Cellular phone - Blackberry Style; and,
23 2) Iphone: IMEI: 013853002900147.

24 CONVEYANCES

- 25
26 3) 2008 Toyota Tundra truck, Washington License Plate: B78524H,
27 VIN: 5TFDV54128X076101.

1 3. If any of the property described above, as a result of any act or
2 omission of the defendant[s]:

- 3
4 a. cannot be located upon the exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the court;
7 d. has been substantially diminished in value; or
8 e. has been commingled with other property which cannot be divided
9 without difficulty,
10

11 the United States of America shall be entitled to forfeiture of substitute property
12 pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title
13 28, United States Code, Section 2461(c).
14

15 DATED: November 12, 2014
16

17 A TRUE BILL
18

19 
20 Foreperson

21 MICHAEL C. ORMSBY
22 United States Attorney

23 
24 SHAWN N. ANDERSON
25 Assistant United States Attorney

26 
27 ALISON L. GREGOIRE
28 Assistant United States Attorney

INDICTMENT